

1 ESTELA O. PINO, SBN 112975  
2 **PINO & ASSOCIATES**  
3 1520 Eureka Rd., Suite 101,  
4 Roseville, CA 95661  
Telephone: (916) 641-2288  
Facsimile: (916) 244-0989

5 Attorneys for Dreyer Babich Buccola Wood Campora, LLP

6  
7 THE UNITED STATES BANKRUPTCY COURT  
8 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

9 **In re:** ) Case Nos. 19-30088 (DM)  
10 )  
11 **PG&E CORPORATION,** ) Chapter 11  
12 )  
13 **-and-** ) **DECLARATION OF STEVE M.**  
14 **In re:** ) **CAMPORA IN SUPPORT OF MOTION**  
15 ) **FOR ORDER EXCUSING DREYER**  
16 **PACIFIC GAS AND ELECTRIC** ) **BABICH BUCCOLA WOOD CAMPORA,**  
17 **COMPANY,** ) **LLP FROM TRANSMITTING**  
18 ) **DOCUMENTS RELATED TO THE**  
19 ) **BANKRUPTCY CASES TO: MICHAEL**  
20 ) **RAMEY; MICHAEL RAMEY AND**  
21 ) **ASSOCIATES, INC.; AND MICHAEL**  
22 ) **RAMEY AS TRUSTEE OF THE RAMEY**  
23 ) **COLBY 2007 TRUST**  
24 )  
25 ) **DATE:** August 8, 2023  
26 ) **TIME:** 10:00 a.m.  
27 ) **PLACE:** **Tele/Videoconference only**  
28 ) 450 Golden Gate Avenue,  
Courtroom 17, 16th Floor  
San Francisco, California  
  
Debtors. )  
☐ Affects PG&E Corporation )  
☐ Affects Pacific Gas and Electric )  
Company )  
☒ Affects both Debtors )  
  
JUDGE: Hon. Dennis Montali  
  
\* All papers shall be filed in the lead case, No. )  
19-30088(DM) ) **OBJECTION DEADLINE: July 25, 2023**  
**(4:00 P.M. Prevailing Pacific Time)**

24 I, Steve M. Campora, hereby declare as follows in support of the Motion for Order Excusing  
25 Dreyer Babich Buccola Wood Campora, LLP from Transmitting Documents Related to the  
26 Bankruptcy Cases to: Michael Ramey; Michael Ramey and Associates, Inc.; and Michael Ramey as  
27 Trustee of the Ramey Colby 2007 Trust (hereinafter referred to as the "Motion"):  
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1           1.       The facts set forth herein are true and within the scope of my personal knowledge,  
2 and if called upon to do so I could and would testify competently to these facts.

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4           2.       I am an attorney duly admitted to practice in the State of California. I am a partner at  
5 Dreyer Babich Buccola Wood Campora, LLP (hereinafter referred to as “Dreyer Babich”), who was  
6 the attorney of record for: Michael Ramey; Michael Ramey and Associates, Inc.; and Michael  
7 Ramey as Trustee of the Ramey Colby 2007 Trust (hereinafter collectively referred to as the  
8 “Creditors”).  
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10          3.       I am authorized on behalf of Dreyer Babich to make these representations in support  
11 of the Motion.  
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13          4.       On January 29, 2019, PG&E Corporation and Pacific Gas & Electric Company filed  
14 petitions for relief under Chapter 11 of Title 11 of the United States Code with the United States  
15 Bankruptcy Court, in and for the Northern District of California, (hereinafter referred to as the  
16 “Court”) commencing case numbers 2019-30088 (DM) and 2019-30089 (DM) (hereinafter  
17 collectively referred to as the “Bankruptcy Cases”).  
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19          5.       On October 2, 2019, Dreyer Babich timely filed three (3) separate Proofs of Claim in  
20 the Bankruptcy Cases on behalf of the Creditors, which were assigned claim numbers 27358, 30710,  
21 and 30720 (hereinafter collectively referred to as the “Proofs of Claim”), seeking damages on behalf  
22 of Creditors arising from the Camp Fire.  
23

24          6.       After the filing of the Proofs of Claim, irreconcilable differences developed between  
25 the Creditors and Dreyer Babich, which led to a breakdown of the attorney-client relationship.  
26 Accordingly, on May 10, 2022, by and through its counsel, Dreyer Babich filed a Motion for Order  
27 Authorizing Withdrawal of Counsel to: Michael Ramey; Michael Ramey and Associates, Inc.; and  
28

1 Michael Ramey as Trustee of the Ramey Colby 2007 Trust (hereinafter referred to as the “Motion to  
2 Withdraw as Counsel”) (Dkt. No. 12349).

3  
4 7. Creditors did not file an opposition to the Motion to Withdraw as Counsel.  
5 Accordingly, on June 8, 2022, Dreyer Babich, by and through its counsel, filed a Request for Relief  
6 Upon Default Re: Motion for Order Authorizing Withdrawal of Counsel to: Michael Ramey;  
7 Michael Ramey and Associates, Inc.; and Michael Ramey as Trustee of the Ramey Colby 2007 Trust  
8 (hereinafter referred to as the “Request for Relief”) (Dkt. No. 112496), informing the Court that the  
9 Motion to Withdraw as Counsel and supporting documents, including but not limited to Notice Re  
10 Motion to Withdraw as Counsel, were served on the Creditors and no opposition was filed to the  
11 Motion to Withdraw as Counsel. Within the Request for Relief, Dryer Babich requested that the  
12 Court grant the relief requested within the Motion to Withdraw as Counsel.  
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14  
15 8. On June 17, 2022, the Court issued an Order Authorizing Withdrawal of Counsel to:  
16 Michael Ramey; Michael Ramey and Associates, Inc.; and Michael Ramey as Trustee of the Ramey  
17 Colby 2007 Trust (hereinafter referred to as the “Order Authorizing Withdrawal of Counsel”) (Dkt.  
18 No. 12522). A true and correct copy of the Order Authorizing Withdrawal of Counsel is attached  
19 here to as **Exhibit 1**.  
20

21 9. Pursuant to the Order Authorizing Withdrawal of Counsel, the Court also ordered  
22 Dreyer Babich to, “. . . continue to forward all notices and papers in connection with Proof of Claim  
23 numbers 27325, 30710, and 30720 to the Creditors, until the Creditors appear in the above-captioned  
24 bankruptcy cases via counsel or pro se.” *Order Authorizing Withdrawal of Counsel (Dkt. No.*  
25 *12522)*, Pg. 2 (ln. 22-24) (**Exhibit 1**).  
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1           10.     Even though, the Order Authorizing Withdrawal of Counsel was entered more than  
2 an year ago, as of the date of this declaration, none of the Creditors have appeared through counsel  
3 nor have they appeared *pro se* in the Bankruptcy Cases.  
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5           11.     Since the entry of the Order Authorizing Withdrawal of Counsel, Dreyer Babich, as  
6 ordered by the Court, has been reviewing the docket of the Bankruptcy Cases on a regular basis and  
7 has been transmitting to the Creditors, by and through Michael Ramey (hereinafter referred to as  
8 “Mr. Ramey”), all documents filed in the Bankruptcy Cases, which could possibly affect the claims  
9 of the Creditors.  
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11           12.     Out of abundance of caution, Dreyer Babich has even been over inclusive in its  
12 transmittal of documents to the Creditors.  
13

14           13.     It is my understanding that the Creditors are registered with the Fire Victim’s Portal  
15 and are working with the Fire Victim Trust established for claims arising out of the Camp Fire.  
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17           14.     After the Motion to Withdraw as Counsel was granted, Mr. Ramey requested that we  
18 stop communicating with him. I advised him that we wanted to stop, but pursuant to the Court’s  
19 order we are required to forward information to him. I told him we would stop as soon as we had  
20 notice that he had appeared in the Bankruptcy Cases, either individually or through counsel. To  
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1 date, to my knowledge, Mr. Ramey has not appeared. He has had more than sufficient opportunity  
2 to appear in the Bankruptcy Cases and we request relief from the Order Authorizing Withdrawal of  
3 Counsel requiring us to continue communicating with him.  
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5 15. Dreyer Babich, therefore, respectfully requests that the Court excuse it from  
6 transmitting any documents related to the Proofs of Claim and/or the Bankruptcy Cases to the  
7 Creditors.  
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9 I declare under penalty of perjury under the laws of the United States of America that the  
10 foregoing is true and correct.  
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12 Executed this 11th day of July, 2023, at Sacramento, Sacramento County, California.

13 /s/ Steve M. Campora

14 Steve M. Campora  
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